



U.S. Department of Justice

United States Attorney
District of Minnesota

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Via ECF

January 11, 2021

The Honorable Patrick J. Schiltz
United States District Court
300 South Fourth Street
Minneapolis, MN 55415

Re: United States v. Leroy Lemonte Perry Williams
No. 20-cr-282(3) (PJS/ECW)

Dear Chambers:

Defendant Leroy Lemonte Perry Williams is scheduled for a change-of-plea hearing on January 25, 2021, at 9:00am via video-conference. The parties write to advise the Court of their present understanding of the statutory and sentencing guideline provisions that apply in this case.

Count 1 of the Indictment charges Mr. Williams with Conspiracy to Commit Arson, in violation of 18 U.S.C. § 371. This charge carries the following statutory penalties:

- a. a maximum of 5 years' imprisonment;
- b. a maximum supervised release term of 3 years;
- c. a maximum fine of \$250,000;
- d. mandatory restitution; and
- e. a mandatory special assessment of \$100.

Sentencing Guidelines Section 2K1.4 applies to Count 1. Mr. Williams' criminal history category appears to be a category IV or V, and the parties anticipate that the adjusted offense level will be 17. This would result in an applicable guidelines range of 37–46 months (if category IV) or 46–57 months (if category V).

The total offense level is calculated as follows:

- a. **Base Offense Level.** The base offense level is 20 (U.S.S.G. § 2K1.4(a)(2)).

- b. **Specific Offense Characteristics.** The parties agree that no specific offense characteristics apply.
- c. **Acceptance of Responsibility and Other Chapter Three Adjustments.** If Mr. Williams (1) provides full, complete and truthful disclosures to the United States Probation and Pretrial Service Office, including providing complete, accurate and truthful financial information; (2) testifies truthfully during the change of plea and sentencing hearings; (3) complies with this agreement; and (4) undertakes no act inconsistent with acceptance of responsibility before the time of sentencing, the Government agrees to recommend that Mr. Williams receive a two-level reduction for acceptance of responsibility under U.S.S.G. § 3E1.1(a), and to move for an additional one-level reduction under § 3E1.1(b). After deducting three points for acceptance of responsibility, the final adjusted offense level becomes 17.

The applicable guideline ranges for supervised release and for a fine are 1 to 3 years (U.S.S.G. § 5D1.2(a)(2)) and \$10,000 to \$95,000 (U.S.S.G. § 5E1.2(c)).

Respectfully,

ERICA H. MACDONALD
United States Attorney

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—and—

/s/ Matthew J. Mankey
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